

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In Re:

iSun, Inc.

Debtor

Chapter 11

Case Number 24-11144

Honorable Thomas M Horan

**FORD MOTOR CREDIT CO.'S OBJECTIONS TO CONFIRMATION OF CHAPTER 11
PLAN AND SALE**

NOW COMES Creditor, Ford Motor Credit Co., by and through its attorneys, Orlans PC, and hereby Objects to Confirmation as follows:

1. On June 3, 2024, the Debtor(s) filed a voluntary petition seeking relief under Chapter 13 of the United States Bankruptcy Code.
2. On the Petition Date, the Debtor(s) were in possession of a 2022 Ford F-150 Lightning VIN No. 1FT6W1EV6NWG11092 (the "2022 Ford Lightning"), a 2022 Ford F-150 VIN No. 1FTMF1EB0NKF26916 (the "2022 Ford F-150"), a 2022 Ford F-150 VIN No. 1FTMF1EP2NKF28145 (the "2022 Ford"), a 2023 Ford F-150 Lightning VIN No. 1FTVW1EL3PWG13573 (the "2023 Ford Lightning"), a 2023 Ford F-150 VIN No. 1FTMF1EB8PKE30227 (the 2023 Ford F-150), a 2023 Ford Super Duty F-250 SRW VIN No. 1FTBF2BA3PEC75707 (the "Ford Super Duty"), a 2023 Ford Super Duty F-250 SRW VIN No. 1FTBF2BA4PED37048 (the "2023 Ford F-250"), a 2019 Ford F-450 VIN No. 1FDUF4HT6KEE49724 (the "2019 Ford F-450"), a 2023 Ford F-150 VIN No. 1FTFX1E55PFB37149 (the "2023 Ford"), a 2023 Ford F-150 VIN No. 1FTFX1E56PFB49262 (the "Ford F-150"), and a 2023 Ford F-150 VIN No. 1FTEX1EP6PKF91852 (the "F-150") (together, the "Vehicles") and indebted to Ford Motor Credit Co. (the "Creditor") in the amount of \$74,881.53 for the 2022 Ford

Lightning, \$33,692.39 for the 2022 Ford F-150, \$33,857.28 for the 2022 Ford, \$69,307.89 for the 2023 Ford Lightning, \$38,162.68 for the 2023 Ford F-150, \$47,993.57 for the Ford Super Duty, \$48,629.97 for the 2023 Ford F-250, \$9,362.49 for the 2019 Ford F-450, \$32,823.96 for the 2023 Ford, \$32,647.92 for the Ford F-150, and \$48,060.27 for the F-150 (plus fees, costs, and interest) for these Vehicles.

3. The Vehicles were purchased on Retail Installment Sale Contracts (the "Contracts").
(Copies of the Contract is attached as Exhibit A).
4. On July 10, 2024, Debtors filed a Notice of Sale by Auction, Sale Hearing, and Designation of Stalking Horse Bidder.
5. The Sale as proposed cannot be confirmed for the following reasons:
 - a. Creditor does not agree to being included in this liquidating plan.

WHEREFORE, Ford Motor Credit Co., by and through its attorneys, objects to the Sale and prays that Sale be denied.

Date: July 23, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ Elizabeth A. Trachtman
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